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February 23, 2016

VIA ECF

Honorable Marilyn D. Go
United States Magistrate Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Adesola Agoro v. City of New York et al.,
15 CV 4339 (RJD)(MDG)

Your Honor:

I am a Senior Counsel in the Office of Zachary W. Carter, Corporation Counsel of the City of New York, representing defendant City of New York ("City") in the above-referenced matter. I write, pursuant to the Court's December 8, 2015 Order, to provide the Court with a Joint Status Report in this action.

By way of background, plaintiffs allege, *inter alia*, that they were the subject of a false arrest by Sergeant Gaetjean Doxy, a member of the New York City Police Department, on or about March 25, 2014 in the lobby of 2926 West 25th Street in Brooklyn, New York.

To date, defendants have served responses to plaintiffs' interrogatories and request for production of documents. At this time, defendants have requested the following outstanding discovery items from plaintiffs: (1) responses to Defendants' First Set of Interrogatories and Request for Production of Documents issued on December 24, 2015; (2) an executed Stipulation and Protective Order in the form provided to them regarding disclosure of confidential materials; and (3) an executed §160.50(1)(d) release relating to plaintiff Natalie Metullus's Indictment No. 2014KN039868 which followed her arrest on December 8, 2015.¹ Plaintiffs have agreed to provide these documents by February 29, 2016. Once this discovery is provided, the parties will thereafter identify any further deficiencies in the written discovery and promptly schedule depositions.

Respectfully submitted,

/s/

Suvarna Sampale
Senior Counsel
Special Federal Litigation Division

cc: **BY ECF**
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¹ The §160.50 previously provided to defendants for plaintiff Natalie Metullus inadvertently referenced the incorrect indictment number.